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**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Cox Enterprises/Cox Media Group/
Georgia Television, LLC/WSB-TV
Transfer of Control of
The Broadcast License to Terrier
Media Buyer, Inc.

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MB Docket No. 19-98

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**Reply to Opposition to Petition to Deny Cox Enterprises/Cox Media Group/Georgia
Television, LLC/ WSB-TV Transfer of Control of the Broadcast License to Terrier Media
Buyer, Inc.**

Henry Wendel
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May 30, 2019

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Reply/Response

This is in response to the Beauford Petition to Deny Opposition beginning at Section 4 of the Opposition. **WSB-TV clearly violated FCC CFR §73.3526 Public Inspection File.** From the beginning of my first visit to WSB on October 23, 2015, I buzzed the front door buzzer at WSB-TV. The security guard would not allow me to enter the building after I told her I was there to view the Public Inspection File. That Directive came from WSB-TV Management.

The fact that WSB-TV violated FCC CFR §73.3526 was validated from Ms. Nicholson of the FCC with her phone call in October 2016.

At the time of my first visit on October 23, 2015, WSB-TV did not grant me access to their Public Inspection File. I told them what I wanted to see in their Public Inspection File (the email, Q4 of 2014, Q1 and Q2 of 2015) and the lady had no clue. This is why she said, “this will take a while”. She came back with another lady which had the Post-it that had “FCC.gov” on it. Then I was escorted to the exit door. I asked their names? The lady with the Post-It said, “Vicky and Cathy”. I was not granted access to WSB’s Public Inspection File.

When I was escorted to the exit door, FCC CFR §73.3526 was clearly violated.

Opposition stated that WSB’s file is On-Line. Therefore it is in “Electronic Form in a computer database”. Instead of being escorted to the exit door, they should have escorted me to a computer terminal as Commission rules dictate. FCC rules clearly states that if the Public Inspection File is in Electronic Form, a computer terminal must be provided for Public Inspection. There was no computer in the Lobby of WSB-TV at that time.

**THIS IS ANOTHER VIOLATION WSB-TV COMMITTED THAT WAS ADMITTED BY
COUNSEL REPRESENTING THEM!**

This is not only evidence of a violation; it is also evidence of non-compliance of the Statute of FCC rules and regulations Opposition Counsel pointed out.

This is how the FCC states it:

“Access to material in the file.

(1) The file shall be available for public inspection at any time during regular business hours. All or part of the file may be maintained in a computer database, as long as a computer terminal is made available, at the location of the file, to members of the public who wish to review the file. Material in the public inspection file shall be made available for printing or machine reproduction upon request made in person. The applicant, permittee, or licensee may specify the location for printing or reproduction, require the requesting party to pay the reasonable cost thereof, and may require guarantee of payment in advance (e.g., by requiring a deposit, obtaining credit card information, or any other reasonable method). Requests for copies shall be fulfilled within a reasonable period of time, which generally should not exceed 7 days.”

The response from WSB staff was inappropriate, not in good faith and definitely not in compliance with Commission rules.

In correction with Opposition, I did not return to WSB TV after the call from Tim McVay. I returned to WSB after Tim McVay was ordered by the FCC to re-invite me back to view the Public Inspection File. This was confirmed by Ms. Nicholson of the FCC when she said during our conversation that someone will be in contact with you to invite you to return to WSB-TV to view the file. Then, she reaffirmed with a “Guarantee” that I will see it. After that I received a call from Tim McVay and he also “Guaranteed” I will see it as well.

WSB clearly failed to meet the obligation of FCC CFR §73.3526 on October 23, 2015.

This is why WSB-TV by order of the FCC to Tim McVay had to invite me to return to the station to view the Public Inspection File again.

Conclusion

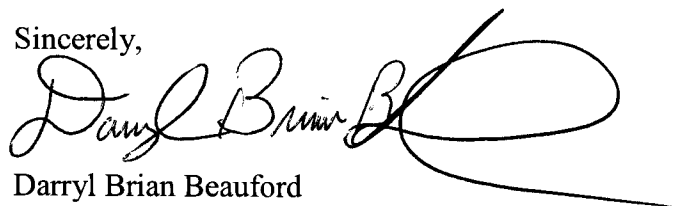
As a Trustee of the Community that is a holder of a Federal Communications Commission broadcast license they have the responsibility and obligation to uphold FCC rules and regulations. On my first visit to that station, I was not allowed to enter the building at first, then when allowed to do so, no one asked me for identification or request any form to prove I am a viewer of this community. Upon being ordered the second time by the FCC to return, then a policy was put in place to view the Public Inspection File.

WSB-TV was never in Compliance with FCC rules and Regulations. The Opposition to my Petition to Deny the Transfer of Control in an "Open Admission" admitted the Public Inspection File was On-Line in Electronic Form. Therefore no computer terminal was made available for me to view the Public Inspection File.

THIS IS ANOTHER CORE VIOLATION OF FCC CFR §73.3526!

Once again, I ask the Federal Communications Commission to Deny the Transfer of Control of the Broadcast License of Cox Enterprises/Cox Media Group/Georgia Television, LLC/WSB-TV to Terrier Media Buyer, Inc.

Sincerely,

A handwritten signature in black ink, appearing to read "Darryl Brian Beauford". The signature is stylized with a large, looping flourish at the end.

Darryl Brian Beauford

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Fayetteville, Georgia 30215

404.769.5539

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Express Mailed to the FCC and Submitted To:

Henry Wendel
Cooley LLP
1299 Pennsylvania Ave.
Ste 700.
Washington, DC 20004-2400

Jane Williams
Executive Vice President
Cox Media Group, LLC

AFFIDAVIT


I Darryl Brian Beauford, am a resident of Fayetteville, County of Fayette, State of Georgia, and do hereby certify, swear or affirm, and declare that I am competent to give the following declaration based on my personal and professional knowledge, and that the following facts and things are true and correct in this Reply to Opposition of my Petition to Deny the Broadcast License Transfer of Control of WSB Television located at 1601 West Peachtree Street, Atlanta, Georgia 30305.

WITNESS my signature this 30th of May 2019.


Signature of Declarant

State of Georgia
County of Fayette

On May 30, 2019, Darryl Brian Beauford personally came before me and being duly sworn, did state that he is the person described in the above document and he signed the above document in my presence.


Signature of Notary

Notary Public, In and for the County Fayette
State of Georgia

My commission expires: 1/17/21 Notary Seal

Olga Bukowski
NOTARY PUBLIC
Fayette County, Georgia
My Commission Expires
January 17, 2021